

Comments
Gulfc0 Draft Removal Action Work Plan
Dated 1/14/2010

Section I

- A. Ok
- B. Above Ground Storage Tank Farm: ok
Former Surface Impoundment Cap: ok

Section II

- A. Preconstruction Activities: ok
 - Sampling & Analysis Plan: asked Ron S to check WM facilities. – Ron OK w/ all 3 disposal facilities..
 - Tank Gauging: ok
 - Sample Collection: ok
 - Sample Analysis: ok
 - Construction QA Plan: ok
 - Regulatory Compliance Plan: ok (pending Legal review) (ARARs)
 - Waste Management Plan: ok
 - Emissions Control Plan: will do air monitoring with a PID, but no action levels or response plan for exceedances. (include action levels & response plan).
 - Contingency Plan: ok
 - Health & Safety Plan: ~~submit HASP to EPA no later than 10 days prior to mobilization.~~ Ok – covered under schedule (14D after contractor approval by EPA.
 - Schedule: start of work open ended - submit proposed construction contractor no later than 30 days after AOC is signed to EPA for approval sampling within 30 days of EPA approval of contractor & notice to proceed; Mobilization after receipt of sample data/validation & disposal facility approval for acceptance (open ended – mobilization within 60 days after approval to proceed.)
 - Field activities completed within approx 45 days. (open ended - field activities completion within 105 days of approval to proceed.
 - Final Report within 45 days of receipt of all documentation (open ended – final report with 150 days of approval to proceed).
- B. Mobilization & Site Preparation: ok
- C. Removal Action Activities:
 - a. Task 1 – Accumulated Water Removal: left message w/ Luda to check on appropriate TCEQ discharge criteria (1/20/10). Ok otherwise. **Luda – check w/ Susan Reillyn @ TCEQ 512/239-4590.**
 - b. Task 2 – Container content removal/disposal: ok

- c. Task 3 – Container Removal: develop decon procedures based on container contents. Not specific on decon procedures (provide decon procedures based on former sampling & include in workplan or as an appendix). Ok otherwise.
 - d. Task 4 – ok
 - D. Emissions Control – ok
 - E. Site Restoration & Demobilization – ok
 - F. Preparation of Final Report – ok except schedule – see previous comment about being open ended.
- III. Former Surface Impoundments CAP Repair (p. 15) - ok
- A. Preconstruction Activities: will do cap assessment & prep drawings/specs for EPA approval prior to mobilization. (schedule?) A HASP will be submitted prior to any construction (schedule?) location of borrow material OK with Trustees? – left call with Jessica to check (restriction on borrow location, etc.).
 - B. Sampling & Analysis Plan: ok
 - C. Construction QA Plan: specify frequency of geotechnical testing ok – spec'd out in plans & specs – ok
 - D. Regulatory Compliance Plan – lists ARARs – need Legal review.
 - E. Waste Management Plan – ok
 - F. Emissions Control Plan – ok
 - G. Contingency Plan – ok
 - H. Health & Safety Plan – ok
 - I. Schedule: start of work open ended – submit proposed construction contractor no later than 30 days after AOC is signed to EPA for approval; HASP within 14 days of approval of construction contractor & notice to proceed; Plans/specs within 30 days of EPA approval to proceed; mobilization after EPA approval of plans/specs & field activities may be complete within approx 45 days (open ended – complete field construction no later than 75 days following EPA approval of plans/specs) Final Report within 45 days of receipt of all documentation (open ended – final report with 120 days of approval to proceed).
 - J. Mobilization & Site Prep: ok
 - K. Removal Action Activities:
 - 1. Task 1 – Debris, Brush & Shell Removal: ok
 - 2. task 2 – Imported Clay Placement/Compaction: ok
 - 3. Task 3 – Topsoil Layer Placement & Vegetation: include description of seed mix, or say it will be included in plans/specs.
 - L. Site Restoration & Demob: ok
 - M. Preparation of Final Report: within 45 days of receipt of all necessary documentation – too open – see comment above.